

Exhibit 2

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JAIMARIA BODOR, :
individually and on :
behalf of all others :
similarly situated, :
:
Plaintiff(s), :
:
vs. :
:
MAXIMUS FEDERAL :
SERVICES, INC., :
:
CIVIL ACTION NO.
Defendant(s) . : 5-19-cv-05787-EGS

- - -

Friday, October 2, 2020
Philadelphia, Pennsylvania

- - -

Oral Deposition of JAIMARIA BODOR GOSS, held
via Zoom teleconference, commencing at approximately
11:14 a.m., on the above date, before Josephine
Guerrieri, Professional Court Reporter and
Commissioner of Deeds.

- - -

VERITEXT LEGAL SOLUTIONS
MID-ATLANTIC REGION
1801 Market Street - Suite 1800
Philadelphia, Pennsylvania 19103

- - -

<p style="text-align: right;">Page 2</p> <p>1 A P P E A R A N C E S:</p> <p>2</p> <p>3 NATIONAL CONSUMER LAW CENTER</p> <p>4 BY: ALICE BUTTRICK, ESQUIRE</p> <p>5 81 Prospect Street</p> <p>6 Brooklyn, New York 11201</p> <p>7 518-732-6703</p> <p>8 Abuttrick@justicecatalyst.org</p> <p>9 Counsel for Plaintiff(s)</p> <p>10 FLITTER MILZ, PIC.</p> <p>11 BY: JODY THOMAS LOPEZ-JACOBS, ESQUIRE</p> <p>12 450 North Narberth Avenue</p> <p>13 Suite 101</p> <p>14 Narberth, Pennsylvania 19072</p> <p>15 610-668-0011</p> <p>16 Jlopez-jacobs@consumerslaw.com</p> <p>17 Counsel for Plaintiff(s)</p> <p>18 SAUL EWING, LLP</p> <p>19 BY: RYAN DiCLEMENTE, ESQUIRE</p> <p>20 MARISA R. DeFEO, ESQUIRE</p> <p>21 Centre Square West, 38th Floor</p> <p>22 1500 Market Street</p> <p>23 Philadelphia, Pennsylvania 19102</p> <p>24 215-972-7531</p> <p>Counsel for Defendant(s)</p>	<p style="text-align: right;">Page 4</p> <p>1 ---</p> <p>2 I N D E X</p> <p>3</p> <p>4 WITNESS PAGE</p> <p>5 JAIMARIA BODOR GOSS</p> <p>6</p> <p>7 EXAMINATION BY</p> <p>8 MR. DiCLEMENTE 8</p> <p>9 ---</p> <p>10 E X H I B I T S</p> <p>11</p> <p>12 NUMBER DESCRIPTION PAGE</p> <p>13 1 Amended Class Action</p> <p>14 2 Complaint 6</p> <p>15 2 Plaintiff's Responses</p> <p>16 and Objections to</p> <p>17 Defendant's First Set</p> <p>18 of Interrogatories 6</p> <p>19</p> <p>20 3 Response to Request</p> <p>21 for Production 6</p> <p>22 4 Federal Student Aid</p> <p>23 12/18/19 6</p> <p>24</p> <p>5 Federal Student Aid</p> <p>6 12/20/19 6</p> <p>7 6 Department of Education</p> <p>8 National Student Loan</p> <p>9 Data System 6</p> <p>10 7 Coast Professional</p> <p>11 Notice 6</p> <p>12</p>
<p style="text-align: right;">Page 3</p> <p>1 D E P O S I T I O N S U P P O R T I N D E X</p> <p>2</p> <p>3 DIRECTIONS NOT TO ANSWER:</p> <p>4 PAGES: None</p> <p>5 REQUESTS FOR DOCUMENTS OR INFORMATION</p> <p>6 PAGES: 84, 85, 87, 94</p> <p>7</p> <p>8 STIPULATIONS AND/OR STATEMENTS:</p> <p>9 PAGES: 7</p> <p>10 MARKED QUESTIONS:</p> <p>11 PAGES: None</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 5</p> <p>1 1 E X H I B I T S</p> <p>2 2 NUMBER DESCRIPTION PAGE</p> <p>3 3 8 Court of Common</p> <p>4 4 9 Pleas Bucks County Criminal Docket 6</p> <p>5 5 10 Police Blotter E-mail - 4/15/19</p> <p>6 6 11 Supplemental Responses</p> <p>7 7 12 United States Treasury Check</p> <p>8 8</p> <p>9 9 not in possession of reporter</p> <p>10</p> <p>11 10</p> <p>12 11</p> <p>13 12</p> <p>14 13</p> <p>15 14</p> <p>16 15</p> <p>17 16</p> <p>18 17</p> <p>19 18</p> <p>20 19</p> <p>21 20</p> <p>22 21</p> <p>23 22</p> <p>24 23</p> <p>25 24</p>

<p style="text-align: right;">Page 6</p> <p>1 - - -</p> <p>2 P R O C E E D I N G S</p> <p>3 - - -</p> <p>4 (Whereupon, a group of</p> <p>5 documents were marked Exhibit-1</p> <p>6 through Exhibit-12, respectively.)</p> <p>7 - - -</p> <p>8 (Whereupon the court reporter</p> <p>9 placed the following statement on</p> <p>10 the record:)</p> <p>11 The attorneys participating</p> <p>12 in this deposition acknowledge</p> <p>13 that I am not physically present</p> <p>14 in the deposition room and that I</p> <p>15 will be reporting this deposition</p> <p>16 remotely.</p> <p>17 They further acknowledge</p> <p>18 that, in lieu of an oath</p> <p>19 administered in person, I will</p> <p>20 administer the oath remotely.</p> <p>21 The parties and their counsel</p> <p>22 consent to this arrangement and</p> <p>23 waive any objections to this</p> <p>24 manner of reporting.</p>	<p style="text-align: right;">Page 8</p> <p>1 as follows:</p> <p>2 - - -</p> <p>3 E X A M I N A T I O N</p> <p>4 - - -</p> <p>5 BY MR. DiCLEMENTE:</p> <p>6 Q. So, good morning, Ms. Bodor.</p> <p>7 I'm going to briefly just walk</p> <p>8 about some ground rules today. Thank you</p> <p>9 for joining us. I think what I'm going to</p> <p>10 try to do is speak very slowly, ask my</p> <p>11 questions very slowly and what we're trying</p> <p>12 to do is allow your counsel the opportunity</p> <p>13 to lodge an objection.</p> <p>14 So, you may hear me ask a</p> <p>15 question and then I would ask you to pause</p> <p>16 for a few seconds before responding and</p> <p>17 allow your counsel the opportunity to object</p> <p>18 to that question and then await further</p> <p>19 instructions from your counsel.</p> <p>20 Do you understand that, Ms.</p> <p>21 Bodor?</p> <p>22 A. Yes.</p> <p>23 Q. So -- and -- have you ever</p> <p>24 been deposed before?</p>
<p style="text-align: right;">Page 7</p> <p>1 Please indicate your</p> <p>2 agreement by stating your name,</p> <p>3 who you represent and your</p> <p>4 agreement on the record.</p> <p>5 - - -</p> <p>6 MR. DiCLEMENTE: Ryan</p> <p>7 DiClemente for the defendants and</p> <p>8 I agree and acknowledge.</p> <p>9 MS. BUTTRICK: Alice Buttrick</p> <p>10 for the plaintiff and I agree and</p> <p>11 acknowledge.</p> <p>12 - - -</p> <p>13 (It is agreed by and among</p> <p>14 Counsel for the respective parties</p> <p>15 that the reading, signing,</p> <p>16 sealing, filing and certification</p> <p>17 are hereby waived, and all</p> <p>18 objections, except as to the form</p> <p>19 of the question, are reserved</p> <p>20 until the time of trial.)</p> <p>21 - - -</p> <p>22 JAIMARIA BODOR GOSS, having</p> <p>23 been first duly sworn, was</p> <p>24 examined and testified under oath</p>	<p style="text-align: right;">Page 9</p> <p>1 A. No.</p> <p>2 Q. Okay. So, the way this is</p> <p>3 going to work is I'm going to ask a series</p> <p>4 of questions, and the court reporter is</p> <p>5 going to take down your response and the</p> <p>6 court reporter is then going to create a</p> <p>7 transcript of my questions and your</p> <p>8 responses. So, in doing this process, we</p> <p>9 can't have any nonverbal responses from you.</p> <p>10 Obviously, the court reporter</p> <p>11 can't get down as part of the transcript any</p> <p>12 head shaking, nods, things like that,</p> <p>13 pointing to a document that we may be</p> <p>14 talking about, she's not going to be able to</p> <p>15 record that.</p> <p>16 So, just think about that when</p> <p>17 you are responding and remember that all of</p> <p>18 your responses have to be verbal.</p> <p>19 A. Okay.</p> <p>20 Q. If you could wait for me to</p> <p>21 finish my question and I will in turn wait</p> <p>22 for you to finish your answers before I ask</p> <p>23 another question. One of the common</p> <p>24 problems that we all have that's really been</p>

<p style="text-align: right;">Page 22</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Where did you attend</p> <p>3 high school?</p> <p>4 A. Westmont Christian Academy.</p> <p>5 Q. And did you graduate?</p> <p>6 A. Yes.</p> <p>7 Q. And what year was that, do you</p> <p>8 remember?</p> <p>9 A. 2007.</p> <p>10 Q. And did you go on to attend</p> <p>11 any colleges?</p> <p>12 A. Yes.</p> <p>13 Q. Can you tell me, start with</p> <p>14 the first one, if there were multiple and</p> <p>15 tell me about your educational history after</p> <p>16 high school.</p> <p>17 A. I went back to school in</p> <p>18 roughly 2012.</p> <p>19 Q. And what college was that?</p> <p>20 A. Everest University online.</p> <p>21 Q. And that was a purely online</p> <p>22 college?</p> <p>23 A. Yes.</p> <p>24 Q. And you began that in 2012?</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. I'm sorry, in 2012, that would</p> <p>2 have been before you graduated high school,</p> <p>3 which would have been extremely impressive,</p> <p>4 so, I apologize.</p> <p>5 In 2012 did you begin taking</p> <p>6 online courses in Everest in the fall of</p> <p>7 2012?</p> <p>8 A. I believe so, yes.</p> <p>9 Q. And approximately what time of</p> <p>10 year in 2013 did Everest close?</p> <p>11 A. Roughly it was the summer,</p> <p>12 early fall.</p> <p>13 Q. And did you attend another</p> <p>14 college after Everest?</p> <p>15 A. No.</p> <p>16 Q. Any other post high school</p> <p>17 education other than Everest?</p> <p>18 A. Just for my GED.</p> <p>19 Q. Okay. When did you get your</p> <p>20 GED?</p> <p>21 A. In 2007.</p> <p>22 Q. Did you take out any loans in</p> <p>23 connection with your attendance online at</p> <p>24 Everest?</p>
<p style="text-align: right;">Page 23</p> <p>1 A. Yes.</p> <p>2 Q. Did you have an major or a</p> <p>3 particular area of study?</p> <p>4 A. Yes.</p> <p>5 Q. What was that?</p> <p>6 A. Business administrative,</p> <p>7 business management.</p> <p>8 Q. Okay. And did you complete</p> <p>9 your degree at Everest?</p> <p>10 A. No.</p> <p>11 Q. Is there any reason why you</p> <p>12 didn't get a degree from Everest?</p> <p>13 A. Yes.</p> <p>14 Q. What is that?</p> <p>15 A. The school was closed.</p> <p>16 Q. Okay. And when did the school</p> <p>17 close?</p> <p>18 A. In 2013, roughly.</p> <p>19 Q. So, you began taking online</p> <p>20 classes in 2002, the fall of 2002?</p> <p>21 MS. BUTTRICK: Objection. I</p> <p>22 think you're misstating the</p> <p>23 testimony.</p> <p>24 BY MR. DiCLEMENTE:</p>	<p style="text-align: right;">Page 25</p> <p>1 A. No.</p> <p>2 Q. So, you didn't have any</p> <p>3 student loans in connection with your</p> <p>4 attendance at Everest?</p> <p>5 A. No.</p> <p>6 Q. Did you ever take out any</p> <p>7 student loans?</p> <p>8 A. No.</p> <p>9 Q. Are you currently employed?</p> <p>10 A. Yes.</p> <p>11 Q. Where are you working?</p> <p>12 A. Burger King.</p> <p>13 Q. And how long have you worked</p> <p>14 there?</p> <p>15 A. Roughly six, seven months.</p> <p>16 Q. And what did you do before</p> <p>17 Burger King, were you employed?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Where was that?</p> <p>20 A. For a place called White Tail</p> <p>21 Disposal.</p> <p>22 Q. Say that again, you were a</p> <p>23 little muffled.</p> <p>24 A. White Tail Disposal.</p>

<p style="text-align: right;">Page 26</p> <p>1 Q. Okay. Thank you. And what 2 kind of business is that? 3 A. It's a trash company. 4 Q. And how long were you employed 5 there? 6 A. Two-and-a-half months. 7 Q. And what were some of your 8 responsibilities? 9 A. I answered phone calls, 10 started new services, cancelled services, 11 scheduled pickups. 12 Q. And what about before White 13 Tail Disposal, were you employed somewhere 14 else? 15 A. Yes. 16 Q. Where was that? 17 A. Taco Bell. 18 Q. Okay. When I use the term 19 Borrower Defense Application, do you know 20 what that is? 21 A. Yes. 22 Q. What is your understanding of 23 that term, ma'am? 24 A. It is an application that I</p>	<p style="text-align: right;">Page 28</p> <p>1 was that? 2 A. It was a letter stating as to 3 why my taxes were garnished. 4 Q. And do you remember when that 5 communication was approximately received? 6 A. About four weeks after filing 7 my taxes. 8 Q. Do you remember when you filed 9 your taxes? 10 MS. BUTTRICK: Ryan, can we 11 pause here? 12 MR. DiCLEMENTE: Sure. 13 MS. BUTTRICK: We're talking 14 about taxes in general. I think 15 it might be helpful if we were 16 talking about a specific year. 17 MR. DiCLEMENTE: Sure. 18 BY MR. DiCLEMENTE: 19 Q. Well, let's go back to your 20 response. So, you indicated that you had 21 filed the Borrower Defense Application to 22 stop collection on your taxes; is that 23 correct? 24 A. Yes.</p>
<p style="text-align: right;">Page 27</p> <p>1 filled out to stop collections on my taxes. 2 Q. Can you explain that again, I 3 lost you a little bit? 4 A. It's an application that I had 5 filled out to stop collections on my taxes. 6 Q. And do you know who you 7 submitted that application to? 8 A. The Department of Education. 9 Q. And you had indicated, I 10 think, and if I'm rephrasing something 11 that's incorrect, ma'am, just stop me and 12 tell me that you don't think it's correct. 13 You had submitted the 14 application to stop collection on your 15 taxes, correct? 16 A. Yes. 17 Q. And who was collecting on your 18 taxes? 19 A. Maximus. 20 Q. Do you know -- how do you know 21 that? 22 A. I was send information from 23 the IRS. 24 Q. And what type of information</p>	<p style="text-align: right;">Page 29</p> <p>1 Q. Was there a specific year that 2 you were focused on? 3 A. That was 2019. 4 Q. Okay. So, you filed the 5 application in 2019, but would it have been 6 to collection on your taxes for 2018 -- 7 A. Yes. 8 Q. -- the year 2018? 9 A. Yes. 10 Q. Sorry, that's my fault. 11 A. That's okay. 12 Q. So, let's just clarify that 13 again. 14 You had filed it in 2019, so, 15 that would have been for the tax year of 16 2018, correct? 17 A. Yes. 18 Q. Okay. And if I'm 19 understanding correctly, -- well, let's take 20 a step back. So, when did you file your 21 taxes for the year 2018? 22 A. Around April, May to April. 23 Q. So, you filed your taxes 24 mid-April, correct?</p>

<p style="text-align: right;">Page 38</p> <p>1 that.</p> <p>2 Did the communication with the</p> <p>3 IRS provide a reasoning for why it was</p> <p>4 withheld?</p> <p>5 A. Just for a past due debt.</p> <p>6 Q. And did you know what that</p> <p>7 debt was?</p> <p>8 A. For the Department of</p> <p>9 Education.</p> <p>10 Q. And what -- was there anything</p> <p>11 specific about the debt to the Department of</p> <p>12 Education?</p> <p>13 A. No.</p> <p>14 Q. So, it just said a debt owing</p> <p>15 to the Department of Education?</p> <p>16 A. No.</p> <p>17 Q. Do you -- and you have no</p> <p>18 understanding when you received that letter</p> <p>19 as to what debt they were referring to?</p> <p>20 A. No -- yes, sorry. I'm going</p> <p>21 to get this mixed up. I did understand, but</p> <p>22 from my understanding it was they were not</p> <p>23 allowed to because I had filed the</p> <p>24 application to prevent that.</p>	<p style="text-align: right;">Page 40</p> <p>1 collect on?</p> <p>2 A. Yes, they had stated that when</p> <p>3 I started school I had taken out student</p> <p>4 loans, which my understanding when I had</p> <p>5 enrolled in the school were Pell grants and</p> <p>6 grants.</p> <p>7 Q. You said Pell grants and I</p> <p>8 didn't hear the second part?</p> <p>9 A. Grants.</p> <p>10 Q. And was it your understanding</p> <p>11 that you did not need to repay those?</p> <p>12 A. Correct.</p> <p>13 Q. So, when I asked you earlier</p> <p>14 about did you take out any loans in order to</p> <p>15 go to Everest, you said no, correct?</p> <p>16 A. Correct.</p> <p>17 Q. And the reason why you said no</p> <p>18 was because you understood that what you</p> <p>19 received in connection with your education</p> <p>20 at Everest were grants, correct?</p> <p>21 A. Correct.</p> <p>22 Q. And those grants did not need</p> <p>23 to be repaid, correct?</p> <p>24 A. Correct?</p>
<p style="text-align: right;">Page 39</p> <p>1 Q. Okay. So, let's unpack that a</p> <p>2 little bit.</p> <p>3 You understand that they</p> <p>4 weren't allowed to collect on what debt?</p> <p>5 A. They weren't allowed to take</p> <p>6 my tax refund to go towards this debt owed</p> <p>7 for the --</p> <p>8 Q. I'm sorry, are you finished,</p> <p>9 ma'am?</p> <p>10 A. No, I lost my words. For the</p> <p>11 student loans, they stated I had taken, that</p> <p>12 the Borrower Defense Application would stop</p> <p>13 the collections.</p> <p>14 Q. Are you finished?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. So, you understood that</p> <p>17 the Borrower Defense Application would stop</p> <p>18 the collection of certain loans that the</p> <p>19 Department of Education was trying to</p> <p>20 collect?</p> <p>21 A. Correct.</p> <p>22 Q. Okay. Do you have any</p> <p>23 understanding as to what loans the</p> <p>24 Department of Education was trying to</p>	<p style="text-align: right;">Page 41</p> <p>1 Q. So, it was your understanding</p> <p>2 at the time, when you attended Everest</p> <p>3 College, where you actually didn't receive</p> <p>4 any loans, correct?</p> <p>5 A. Correct.</p> <p>6 Q. Is that still your</p> <p>7 understanding today?</p> <p>8 A. No, I obviously -- I mean -- I</p> <p>9 mean my understanding is they were supposed</p> <p>10 to be grants, not loans.</p> <p>11 Q. Other than the Borrower</p> <p>12 Defense Application, did you file anything</p> <p>13 else with the Department of Education about</p> <p>14 those grants?</p> <p>15 A. Yes.</p> <p>16 Q. What else did you file?</p> <p>17 A. I filed a close school</p> <p>18 discharge.</p> <p>19 Q. And when was that filed?</p> <p>20 A. In 2016, roughly, early 2016.</p> <p>21 Q. Okay. And what was your</p> <p>22 understanding of that document that you were</p> <p>23 submitting?</p> <p>24 A. That I had initially though</p>